

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA

v.

VANCE LUTHER BOELTER

Case No. 25-mj-376 (JFD)

**FILED UNDER SEAL PURSUANT TO
COURT ORDER**

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT ONE

(Stalking of Melissa Hortman – Use of Interstate Facilities)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used an interactive computer service, electronic communication service, and electronic communication system of interstate commerce, and a facility of interstate or foreign commerce, to engage in a course of conduct that placed that person in a reasonable fear of the death of and serious bodily injury to that person and that person's spouse, and in the course of engaging in such conduct caused the death of that person and that person's spouse, to wit, BOELTER used a GPS navigation system, interstate wires, and the Internet to plan and carry out the stalking, shooting, and killing of Melissa Hortman and Mark Hortman in Brooklyn Park, Minnesota, all in violation of Title 18, United States Code, Sections 2261A(2)(A) and 2261(b)(1).

COUNT TWO

(Stalking of John Hoffman – Use of Interstate Facilities)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, used an interactive computer service, electronic communication service, and electronic communication system of interstate commerce, and a facility of interstate or foreign commerce, to engage in a course of conduct that placed that person in a reasonable

fear of the death of and serious bodily injury to that person, that person's spouse, and that person's immediate family member, and in the course of engaging in such conduct caused permanent disfigurement and life threatening bodily injury to that person and that person's spouse, to wit, BOELTER used a GPS navigation system, interstate wires, and the Internet to plan and carry out the stalking, shooting, and attempted killing of John Hoffman and Yvette Hoffman in Champlin, Minnesota, all in violation of Title 18, United States Code, Sections 2261A(2)(A) and 2261(b)(2).

COUNT THREE

(Murder of Melissa Hortman Through Use of a Firearm)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the stalking offense charged in Count One, knowingly used and carried a firearm, and in furtherance of such crimes, possessed a firearm, and in the course of that crime caused the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, BOELTER shot and killed Melissa Hortman in Brooklyn Park, Minnesota, all in violation of Title 18, United States Code, Section 924(j).

COUNT FOUR

(Murder of Mark Hortman Through Use of a Firearm)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the stalking offense charged in Count One, knowingly used and carried a firearm, and in furtherance of such crimes, possessed a firearm, and in the course of that crime caused the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, BOELTER shot and killed Mark Hortman in Brooklyn Park, Minnesota, all in violation of Title 18, United States Code, Section 924(j).

COUNT FIVE

(Shooting of Melissa and Mark Hortman – Firearms Offense)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the stalking offense charged in Court One, knowingly used and carried a firearm, and in furtherance of such crimes, possessed a firearm, which was brandished and discharged, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), (ii), (iii).

COUNT SIX

(Shooting of John and Yvette Hoffman – Firearms Offense)

On or about June 14, 2025, in the State and District of Minnesota and elsewhere, VANCE LUTHER BOELTER, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the stalking offense charged in Count Two, knowingly used and carried a firearm, and in furtherance of such crimes, possessed a firearm, which was brandished and discharged, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), (ii), (iii).

I further state that I am an FBI Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No



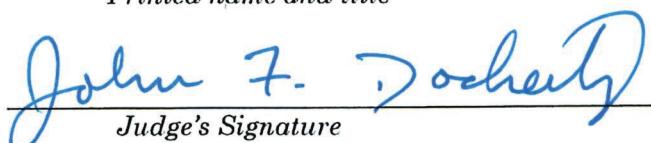
Complainant's signature

SUBSCRIBED and SWORN before me
by reliable electronic means (FaceTime and email)
pursuant to Fed. R. Crim. P. 41(d)(3).

Date: June 15, 2025

Terry A. Getsch
FBI

Printed name and title



Judge's Signature

City and State: St. Paul, MN

The Honorable John F. Docherty
United States Magistrate Judge

Printed Name and Title